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Fwd: Subpoena of Baltimore City SAO (1:19-cv-00698-ELH)

Judson Arnold <jarnold@nklawllp.com> Tue, Sep 8, 2020 at 5:07 PM
To: Mayer Engelsberg <mengelsberg@nklawllp.com>

Sent from my iPhone

Begin forwarded message:

From: "Shiff, Wendy" <wshiff@oag.state.md.us>
Date: September 8, 2020 at 5:04:00 PM EDT
To: Judson Arnold <jarnold@nklawllp.com>
Subject: Re: Subpoena of Baltimore City SAO (1:19-cv-00698-ELH)

Judson,
You received the file (redacted). The documents you were seeking were not in the portion of the file that was retained. I don't know if the documents you were seeking were destroyed in the great courthouse storage flood or not.
You are welcome to call if you have questions. 443-253-8288.
Wendy

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From: Judson Arnold <jarnold@nklawllp.com>
Sent: Tuesday, September 8, 2020 1:18:58 PM
To: Shiff, Wendy <wshiff@oag.state.md.us>
Subject: Re: Subpoena of Baltimore City SAO (1:19-cv-00698-ELH)

Hey Wendy,

Just following up on whether there has been any progress with the City SAO processing the subpoena it received on 7/31? I know everyone is busy, so I appreciate your time.

Thanks,

Judson

On Tue, Aug 18, 2020 at 2:13 PM Shiff, Wendy
<wshiff@oag.state.md.us> wrote:

Meeting just ended. Call anytime convenient for you.

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From: Judson Arnold <jarnold@nklawllp.com>
Sent: Tuesday, August 18, 2020 12:57:55 PM
To: Shiff, Wendy <wshiff@oag.state.md.us>
Subject: Re: Subpoena of Baltimore City SAO (1:19-cv-00698-ELH)

Wendy,

I'll call you after your 2:30 meeting. Thanks.

Judson

On Tue, Aug 18, 2020 at 12:29 PM Shiff, Wendy
<wshiff@oag.state.md.us> wrote:

Mr. Arnold,

I tried to explain to you last week that the SAO was not served with your subpoena.

I told you that the SAO would provide you with the documents provided to the other side.

That is my understanding of the materials that you were provided.

If you have additional questions, feel free to call. I have a meeting until 2:30, but will be available to speak thereafter.

443-253-8288.

Thanks,

Wendy

From: Judson Arnold <jarnold@nklawllp.com>

Sent: Tuesday, August 18, 2020 12:18 PM

To: Shiff, Wendy <wshiff@oag.state.md.us>

Subject: Re: Subpoena of Baltimore City SAO (1:19-cv-00698-ELH)

Hello Ms. Shiff,

I picked up a disc from the State's Attorney's Office yesterday in response to our subpoena. After reviewing the contents of the disc, it appears the SAO has not disclosed any documents from before or during the original trial of Plaintiff.

Our subpoena requests:

"All documents in your possession, custody, or control that comprise, constitute, refer, or relate to your file for the investigation, prosecution, and conviction of Jerome Johnson in Case No. 18831504 (Circuit Court for Baltimore City)."

Please let me know how I can get these documents. If the SAO intends to assert a privilege or is suggesting that these documents do not exist, please let me know.

Thanks for your continued time.

Judson

On Thu, Aug 13, 2020 at 4:47 PM Judson Arnold
<jarnold@nklawllp.com> wrote:

Thanks. I appreciate it.

Sent from my iPhone

On Aug 13, 2020, at 4:45 PM, Shiff, Wendy
<wshiff@oag.state.md.us> wrote:

I don't think they have it but I will double check.

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From: Judson Arnold <jarnold@nklawllp.com>
Sent: Thursday, August 13, 2020 4:43:35 PM
To: Shiff, Wendy <wshiff@oag.state.md.us>
Subject: Subpoena of Baltimore City SAO (1:19-cv-00698-ELH)

Hello Ms. Shiff,

My records indicate that our subpoena in the above referenced matter was served on July 31. I wanted to reach out again to coordinate with you regarding the Baltimore City State's Attorney's Office's retrieval of our requested documents. I'm happy to call you at your convenience if that is easier.

Thanks for your time.

Judson

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